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Via Overnight Mail

The Honorable Freda L. Wolfson
United States District Court
District of New Jersey
Clarkson S. Fisher Bldg. & U.S. Cthse.
402 East State Street, Room 2020
Trenton, NJ 08608

**Re: *M.J. Copeland, Individually and Derivatively On Behalf of Johnson & Johnson
v. Charles O. Prince, III, et al.***
Civil Action No. 3:11-cv-04993-FLW-TJB

Dear Judge Wolfson:

We represent derivative plaintiff M.J. Copeland in the above referenced case. Per Your Honor's Order of July 29, 2011, the *Copeland* Complaint was filed on Monday, August 29, 2011, and noted as related to *In re Johnson & Johnson Derivative Litigation*, Civil Action No. 3:10-cv-02033-FLW. Other "demand made" derivative complaints have been filed on behalf of J&J as well, including *Katz v. Weldon, et al.*, Civil Action No. 3:11-cv-04994-FLW-DEA. We will reach out to counsel representing J&J shareholders in the other cases to see whether we can coordinate these various "demand made" cases and suggest a means by which all parties and the Court may deal with these cases efficiently and appropriately.

As Your Honor is aware, the "demand made" cases are materially different from the "demand futile" cases that are presently consolidated with motions to dismiss *sub judice*. Further there are material differences in the allegations made and claims asserted in the "demand made" cases which we hope that all counsel can address responsibly. We are amenable to putting off the defendants' obligation to respond to the "demand made" complaints in the possibility that all parties can present to the Court within 30 days a proposed Order that addresses the administration of these.



Respectfully,

A handwritten signature in black ink, appearing to be 'JCS', written over the word 'Respectfully,'.

James C. Shah

JCS/plm

cc: Defense Counsel (via electronic mail)
Jeffrey S. Abraham, Esq. (via electronic mail)